

EXHIBIT #4

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

SARA H COOMBS-MORINO, et al.

Index No. 22-cv-2234

V.

THE CITY OF NEW YORK, et al

DECLARATION OF SUZANNE DEEGAN

Suzanne Deegan declares as follows pursuant to 28 U.S.C. § 1746:

1. Like Mark Whitsett, I write to ask that my name be removed from the above captioned lawsuit, because I was added to this lawsuit mistakenly.
2. In 2022, Attorney Jo Saint-George was helping many employees of New York City (City) with notices of claims and gathering information and advising us to help us regarding being placed on leave without pay by the City for standing for our religious beliefs in refusing to take the Covid-19 vaccine.
3. I engaged attorney Jo Saint-George with the Women of Color for Equal Justice to help me preserve my rights with a notice of claim.
4. Attorney Saint-George notified me by email that everyone in the above case to confirm participation in the case and a pending appeal, and I realized there was some miscommunication and a clerical mistake regarding my engagement for a notice of claim only that was caused by her intake technology and mistakes made by her temporary administrative staff adding me to the above lawsuit by mistake.
7. I confirm that I understand that if my name is removed from Case #02234, that I am not entitled to any relief that could arise from named plaintiffs if they are successful on appeal.
9. I understand that Attorney Saint-George will file a declaration to ensure that my name is removed from the docket and from the appeal due to the mistake.
10. I respectfully request that steps are taken with the Court to remove my name from the lawsuit as it would be unjust to include me mistakenly.

I declare under penalty of perjury that the foregoing is true and correct.

Dated:

December 12, 2024

Susanne Deegan
Susanne Deegan